# REMARKS/ARGUMENTS

## Remarks concerning amendments to claims

Claims 1-59 have been cancelled and replaced with new claims 60-117.

## Response to Specification Objections

The Office has objected to the existence of URLs in the specification. However, because the present invention relates to the installation of hypertext links in text, the URLs in the present application are necessary to comply with 35 USC 112, first paragraph. In addition, these URLs are not intended to be active links. As MPEP 608.01, part VII, states:

> "Where the hyperlinks and/or other forms of browser-executable codes themselves rather than the contents of the site to which the hyperlinks are directed are part of applicant's invention and it is necessary to have them included in the patent application in order to comply with the requirements of 35 U.S.C. 112, first paragraph, and applicant does not intend to have these hyperlinks be active links, examiners should not object to these hyperlinks."

Accordingly, the Applicant maintains that the objection to the URLs in the specification is in appropriate.

## Response to Claim Objections

The Office objected to informalities in claims 1, 44, and 57. Applicant responds by cancelling these claims and presenting rewritten claims that address and/or avoid the formality issues identified in the Action.

## Response to Rejections — 35 USC 112

The Office rejected claims 45, 47, and 10 under 35 USC 112, second paragraph, for being indefinite. Applicant responds by cancelling these claims and presenting rewritten claims that are composed to avoid the stated issues of indefiniteness. Specifically, the phrases identified as indefinite do not appear in the newly presented claims.

**Response to Rejections — 35 USC 101**

The Office rejected claims 56 and 57 under 35 USC 101 for lacking patentable utility. Applicant responds by cancelling these claims and presenting rewritten claims that address the issues identified in the Action. Applicant maintains that the newly composed claims are clearly directed to useful subject matter. Specifically, the claimed system and method for installing links performs a useful task with a valuable result, i.e., the automatic installation of links within text using associations between links and key phrases stored in a database. The practical, real-world utility of the invention is described at length in the description.

**Response to Rejections — 35 USC 102 and 103**

The Office rejected claim 56 under 35 USC 102 as being anticipated by Oren at al. (US Pat. 6,539,387, hereafter "Oren"). The Office also rejected claims 1-18, 20-24, 26-27, 29-30, 35-55, and 57 under 35 USC 103 as being unpatentable over Oren in view of Roberge et al (US Pat. 6,154,750), claims 19, 25, 28, 31-34, 58-59 in further view of Page (US Pat. 6,285,999). Applicant responds by rewriting the claims in order to more clearly define the intended scope of the invention and emphasize the unique new and patentable features of the invention.

In summary, the rewritten claims are directed to a system and method for automatically linking recognized key phrases in text (such as, for example, text contained in a document or file). Automatic linking is accomplished by searching the text for occurrences of key phrases that are stored in a database together with associated links, and then associating the occurrences in the text with one or more of the links. Dependent claims further explicate how each key phrase in the database may be associated with multiple associated links. For example, multiple links may represent "competing definitions" of an associated key phrase. In some embodiments, a comparison of properties of the text with properties of the multiple links allows some of the multiple links to be eliminated, e.g., so that a "best" link is selected for installation.

Regarding the patentability of the newly presented claims over the prior art of record, the claims recite various specific features that are new and not suggested by the prior art. Specifically, Oren does not describe installing or associating links in text, nor does he describe submitting text for finding key phrases in text that match those stored in a database. While Fig. 3 of Oren indicates links among nodes in a hierarchical data structure, there is no suggestion or teaching that any links are created by submitting text for link association using a database of hypertext links and associated key phrases, as recited in the claims of the present application. There is no suggestion in Oren that links be associated with "key phrases" as recited in the claims. There is further no suggestion in Oren of associating key phrases with hypertext links. In summary, while Oren discloses a hierarchical database containing links, the links are not hypertext links associated with key phrases as claimed in the present application. Moreover, Oren does not teach the claimed limitation that at least one key phrase is associated with multiple hypertext links. Nor does Oren teach submission of text, finding occurrences of key phrases in the submitted text, retrieving from a database links associated with the found key phrases, or returning the retrieved links to the submitter in the modes described . In short, Oren does not teach or suggest any one of the claimed limitations.

More specifically, col. 12, lines 53-67 of Oren teaches a manual process for creating links from a paragraph to another page or utility application in the same data structure. Significantly, instead of submitting the highlighted text for automatic linking using a database of hypertext links and associated key phrases, Oren teaches linking the paragraph to another page or application in the data structure, resulting in a color-coded link indication on the display. As shown in Fig. 9, there is no button for submitting the highlighted text for automatic linking of its constituent key phrases using a database of hypertext links and associated key phrases. The laborious manual process described in Oren establishes a link from a paragraph to another page or application in the hierarchical data structure. This is highly distinct from the claimed invention.

Col. 8, lines 55-65 of Oren notes that when paragraphs have been classified according to type, it becomes straightforward to later perform searches within a specific type. There is no teaching by Oren, however, to search text for key phrases and then retrieve hypertext links based on key phrases found in the text.

Col. 13, lines 22-40 of Oren describes manipulation of a hierarchical data structure, not finding key phrases in submitted text and retrieving associated hypertext links from a database. Editing and inserting nodes in a hierarchical tree structure does not correspond to looking up hypertext links associated with recognized key phrases in submitted text.

Col. 9, lines 46-53 and Figure 8 of Oren shows a page with various hypertext links. Significantly, these hypertext links are not the links that can be created using the "Add Node" area for linking paragraphs to pages or applications in Fig. 9. Therefore, an output means for the hypertext links of Figure 8, which provides "information which relates to the hypertexted word or phrase" is not an output means for the previously cited "Add Node" links, which were from whole paragraphs to pages or applications.

It is clear from the above that Oren does not, in fact, teach any one of the limitations of the main claims in the present application. Consequently, Oren does not provide a valid basis for further rejections of dependent claims in combination with other references.

Roberge teaches a system related to "computer database systems in general and to the entry, update, and review of data in hierarchically-organized database views in particular". (col. 1, lines 7-10). Roberge does not teach or suggest associating hypertext links with key phrases found in submitted text. Although Roberge describes nodes in a hierarchical data structure that are associated with label, description, type, and instance, Roberge does not teach the claimed technique of using a database of key phrases and associated hypertext links to recognize key phrases in submitted text and retrieve and return hypertext links associated with the recognized key phrases. Nor does Roberge teach any of the other limitations claimed in the independent claims.

Similarly, the other references of record do not teach the claimed limitations. Nor do the references suggest the specific combination of the claimed limitations which together produce the claimed method of automatically linking key phrases found in text.

In view of the above, the newly presented claims are submitted as clearly patentable over the prior art of record. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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